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July 24, 2024

VIA ECF

Hon. Brian R. Martinotti, U.S.D.J.
United States District Court, District of New Jersey
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Plaza, 3rd Floor
Newark, New Jersey 07102

Re: *In Re: Insulin Pricing Litigation*, Case No. 2:23-md-3080-(BRM/RLS)

Dear Judge Martinotti:

We write on behalf of all class plaintiffs (TPP PBM, Direct Purchaser, TPP Manufacturer) and all Defendants (Manufacturer and PBM). The parties have met and conferred and jointly propose the below schedule for a consolidated amended class action complaint and briefing on motions to dismiss, with the further agreement to treat Thanksgiving week (November 25-29) and Christmas week (December 23-27) as holidays.

Event	Deadline (business day on or after):
Consolidated Amended Class Action Complaint	30 days following Order approving consolidation ¹
Motions to Dismiss. The Manufacturer and PBM Defendants shall each file one consolidated motion.	45 days after amended complaint
Opposition(s) to Motions to Dismiss	45 days after Motions to Dismiss
Replies to Motions to Dismiss	28 days after opposition(s)

¹ Plaintiffs filed a pre-motion letter seeking consolidation on June 5, 2024. ECF No. 195. Pursuant to CMO #5, ¶ IV.6 (ECF No. 127), the parties agree that the August 1, 2024 deadline to amend or add new parties in CMO #10, ECF No. 198, is held in abeyance pending the Court's decision on consolidation.

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We thank the Court for its continued attention to this matter.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO

/s/ Donald A. Ecklund

DONALD A. ECKLUND

cc: All Counsel (via ECF)